

Exhibit 4

Darlene Howard – November 1, 2024

Page 1

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MASSACHUSETTS

3
4 FOUR WOMEN HEALTH SERVICES, LLC,

5 Plaintiff,

6 v.

7 ABUNDANT HOPE PREGNANCY RESOURCE

8 CENTER INC., d/b/a ATTLEBORO WOMEN' S

9 HEALTH CENTER, CATHERINE ROMAN,

10 NICOLE CARGES, and DARLENE HOWARD,

11 Defendants.
12

Civil Action No. :
24-12283

13
14
15 VIDEOTAPED 30(b) (6) DEPOSITION of Abundant

16 Hope Pregnancy Resource Center, Inc. through

17 DARLENE HOWARD, a witness called by counsel for

18 the Plaintiff, taken pursuant to the Federal Rules

19 of Civil Procedure before Katherine A. Tevnan,

20 RMR, CSR No. 129093 and Notary Public in and for

21 the Commonwealth of Massachusetts, at the Offices

22 of Foley Hoag, 155 Seaport Boulevard, Boston, MA,

23 on Friday, November 1, 2024, commencing at 10:11

24 a. m.

Darlene Howard – November 1, 2024

Page 9

1	assume you understood the question. Does that	10:13:11
2	make sense?	10:13:13
3	A. Yes.	10:13:13
4	Q. And then if you need a break at any time,	10:13:13
5	please just let us know and we can take a break.	10:13:16
6	The only thing that we'll ask is if there is a	10:13:19
7	pending question, that you answer that question.	10:13:22
8	Does that make sense?	10:13:24
9	A. Yup.	10:13:24
10	Q. Are you currently employed?	10:13:26
11	A. I am.	10:13:27
12	Q. And where are you currently employed?	10:13:28
13	A. Abundant Hope Pregnancy Resource Center.	10:13:31
14	Q. And what is your role?	10:13:33
15	A. I am the executive director.	10:13:34
16	Q. Does Abundant Hope go by any other names?	10:13:37
17	A. Abundant Hope is the organization that I	10:13:44
18	am employed by.	10:13:47
19	Q. Okay. Does it also go by Attleboro	10:13:48
20	Women's Health Center?	10:13:52
21	A. It is Attleboro Women's Health Center is	10:13:53
22	the medical arm of Abundant Hope.	10:13:58
23	Q. What is your day-to-day involvement with	10:14:05
24	the organization?	10:14:07

Darlene Howard – November 1, 2024

Page 14

1	supporting our assistance to women in the	10:19:46
2	community, whether it be material resources	10:19:49
3	required by many needy families. Or free medical	10:19:55
4	services to women who think they are pregnant.	10:20:02
5	Q. What material resources do you provide?	10:20:12
6	A. We provide a monthly diaper bank which is	10:20:15
7	open to the community. We serve about 70 babies	10:20:20
8	a month. We offer free diapers, wipes, formula,	10:20:24
9	baby food, clothing, blankets, furniture.	10:20:29
10	Anything that a woman needs to take care of her	10:20:36
11	child -- children.	10:20:44
12	Q. And where is all of that stored?	10:20:44
13	A. In our location in Attleboro.	10:20:47
14	Q. At 152 Emory?	10:20:50
15	A. Yes.	10:20:52
16	Q. And then you said you provide free	10:20:53
17	medical services?	10:20:55
18	A. Correct.	10:20:56
19	Q. For women who think they are pregnant?	10:20:56
20	A. Correct.	10:20:58
21	Q. What are those free medical services?	10:20:59
22	A. We do pregnancy testing, limited	10:21:02
23	ultrasounds, STI testing. That's it.	10:21:06
24	Q. When you say pregnancy testing, what type	10:21:17

Darlene Howard – November 1, 2024

Page 38

1 They are a marketing firm that maintains our 10:51:12
2 website and does our Google ads. But other than 10:51:15
3 that -- 10:51:19

4 Q. You said that they create and maintain. 10:51:37
5 Do they create the language of the website? 10:51:39

6 A. Together we did. 10:51:42

7 Q. And with regards to the Google ads, did 10:51:44
8 they create the language of the Google ads? 10:51:47

9 A. They do and we approve it. 10:51:50

10 Q. And so are clients -- the clients are 10:51:53
11 able to make appointments through the, is it 10:52:19
12 AWHC.net? 10:52:25

13 A. No. They reach out to us through the 10:52:25
14 website. We make an appointment not on an on- 10:52:28
15 line scheduling platform. We don't have an on- 10:52:33
16 line scheduling platform. 10:52:36

17 Q. If I could show you another document, the 10:52:38
18 AWHC Make an Appointment. 10:52:44

19 (Exhibit 4 marked 10:52:49
20 for identification) 10:53:04

21 Q. Ms. Howard, do you recognize this 10:53:04
22 document? 10:53:08

23 A. Yes. 10:53:09

24 Q. Is this an image of that, of Make an 10:53:11

Darlene Howard – November 1, 2024

Page 53

1 A. Correct. 11:24:29

2 Q. And who maintains the Abundant Hope 11:24:30

3 website? 11:24:31

4 A. We until -- April of this year we 11:24:33

5 maintained it ourself. But now we have someone 11:24:42

6 that has redesigned, an organization that 11:24:47

7 redesigned the website and they are maintaining 11:24:50

8 the Abundant Hope website. 11:24:53

9 Q. And what is that organization? 11:24:56

10 A. That's inConcert Web Solutions. 11:24:56

11 Q. inConcert Web Solutions? 11:24:59

12 A. Yes. 11:25:02

13 Q. And you talked about Google ads, what are 11:25:02

14 the Google ads for? 11:25:06

15 A. The Google ads are ads we pay for to -- 11:25:08

16 have people find our services. 11:25:16

17 Q. What services do you pay Google ads for? 11:25:21

18 I'm sorry. That was a really bad question. 11:25:25

19 What services do you advertise on Google? 11:25:28

20 A. All the services that Attleboro Women's 11:25:34

21 Health Center provides. 11:25:39

22 Q. Do you advertise the diaper banks on 11:25:40

23 Google? 11:25:44

24 A. We do not. 11:25:44

Darlene Howard – November 1, 2024

Page 58

1 COMMONWEALTH OF MASSACHUSETTS)

2)

3 SUFFOLK, SS.)

4 I, Katherine A. Tevnan, Registered Merit
5 Reporter, Certified Shorthand Reporter No. 129093
6 and Notary Public in and for the Commonwealth of
7 Massachusetts, do hereby certify that DARLENE
8 HOWARD, the witness whose deposition is
9 hereinbefore set forth, was duly sworn by me and
10 that such deposition is a true record of the
11 testimony given by the witness.

12 I further certify that I am neither related
13 to or employed by any of the parties or counsel to
14 this action, nor am I financially interested in
15 the outcome of this action.

16 In witness whereof, I have hereunto set my
17 hand and seal this 4th day of November, 2024.

18 
19 _____

20 Katherine A. Tevnan,
21 Registered Merit Reporter
22 CSR # 129093

23 Notary Public

24 My commission expires March 10, 2028